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Attorneys for Defendant  
Mr. Garcia

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Michele Beckwith, through Assistant United States Attorney Alstyn Bennett, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Edgar Enrique Garcia-Lopez, that the previously scheduled Judgment and Sentencing set for January 30, 2025 be continued to March 6, 2025 at 9:00 a.m.

The parties specifically stipulate as follows:

1. At the October 10, 2024 Status Conference re Judgment and Sentencing the Court modified the sentencing schedule because Mr. Garcia intended to file a Motion to Compel Discovery re: sentencing manipulation and the draft PSR had only published a week prior. The Court reset Judgment and Sentencing for January 9, 2025.

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2. On November 10, 2024, Mr. Garcia requested information from the government  
3 relevant to an objection to the draft PSR assessing a +2 specific offence  
4 characteristic for importation of methamphetamine.

5. On November 15, 2024, the Court granted Mr. Garcia's Motion to Compel  
6 Discovery re: sentencing manipulation. ECF no. 67.

7. The following occurred while defense counsel was on leave from November 28  
8 through December 13, 2024. On December 3, 2024, the government informed  
9 defense counsel that it had reviewed agent's notes and communications and did  
10 not find any materials responsive to the Motion to Compel Discovery re:  
11 sentencing manipulation. Informal objections were due on December 12, 2024.

12. On December 16, 2024, the government confirmed the information necessary for  
13 Mr. Garcia to file an informal objection to the PSR with respect to the +2 specific  
14 offence characteristic for importation of methamphetamine.

15. On December 20, 2024, with no objection from the government, the Court  
16 granted Mr. Garcia's motion to continue Judgment and Sentencing on the basis  
17 that he was exploring next steps with respect to any sentencing manipulation  
18 arguments, and he wished to timely submit informal PSR objections.

19. On January 2, 2025, Mr. Garcia timely submitted informal PSR objections.

20. On January 10, 2025, the final PSR was timely filed.

21. On January 14, 2025, Mr. Garcia requested from the government to review his  
22 seized cellular phone for sentencing mitigation purposes. The government  
23 responded that it had not extracted the information from the seized phone. The  
24 parties are currently making arrangements so that they can both review what is on  
25 the phone.

26. For the above reasons, Mr. Garcia believes that good cause and compelling  
27 circumstances exist to continue the Judgment and Sentencing.

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11. The government does not object to Mr. Garcia's continuance request.
12. For the forgoing reasons, the parties jointly request that the Judgment and Sentencing Schedule be modified as follows.

## Draft PSR completed

## Informal Objections completed

## Final PSR completed

Formal Objections February 20, 2025

**Response to Formal Objections/Sentencing Memorandum** February 27, 2025

Judgment and Sentencing March 6, 2025

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: January 16, 2025

*/s/ Hootan Baigmohammadi*  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Defendant  
Mr. Garcia

Date: January 16, 2025

**MICHELE BECKWITH**  
Acting United States Attorney

*/s/ Alstyn Bennett*  
ALSTYN BENNETT  
Assistant United States Attorney  
Attorneys for Plaintiff

## ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: January 21, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE